

# **Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

WINFRED MUCHIRA,

Plaintiff,

v.

HALAH AL-RAWAF, *et al.*,

Defendants.

Civil Action No. 1:14-cv-770

**DEFENDANTS' RESPONSES TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendants Halah Al-Rawaf, Ibraheem Alrashoudi, Fahad Alrashoudi, and Luluh Alrashoudi (collectively, the "Saudi Family"), without waiving the objections they previously submitted, respond as follows to the correspondingly numbered interrogatories of the First Set of Interrogatories propounded by plaintiff Winfred Muchira:

1. Identify each payment made to Plaintiff for work in the United States for any or all of the Defendants, including the date, amount, form of each payment (e.g., cash, check, direct or other deposit), and the account into which such payment was deposited or transferred, or, if paid in cash, to whom it was paid.

The payments were made in cash to Ms. Muchira as follows:

July 2012 -- salary was given in accordance with Saudi Arabia contract

August 2012 -- \$1,600 received on August 30, 2012, and signed for

September 2012 -- \$1,600 received on September 30, 2012 and signed for

October 2012-- \$1,600 received on October 30, 2012, and signed for

employment in the United States, and each person who participated in, was involved in, or was or responsible for each such filing.

In Saudi Arabia, Halah Alrawaf and Ibraheem Alrashoudi were with Ms. Muchira when she signed her employment contract for work in the United States. In the United States, Halah Alrawaf and Fahad Alrashoudi were with Ms. Muchira when she signed the documents for an extension of her stay in the United States. Fahad Alrashoudi filled out the change of address forms on behalf of Ms. Muchira, Halah Alrawaf, Luluh Alrashoudi, and Sarah Alrashoudi on November 22, 2012. Fahad Alrashoudi also assisted Ms. Muchira in filing her visa application.

12. Identify each person with whom you or any other Defendant discussed the application for a visa for Plaintiff to travel to and remain in the United States, or any extension of that visa, and for each such communication, its date, all participants, and the content of the communication.

In Saudi Arabia, Ms. Muchira discussed the visa application process with Halah Alrawaf and Ibraheem Alrashoudi, and Fahad Alrashoudi helped Ms. Muchira complete the visa form. In the United States, Halah Alrawaf and Fahad Alrashoudi discussed the extension process with Ms. Muchira.

13. Identify each school in the United States attended by or registered for by Ibrahim, Fahad, Luluh, or Sarah Al-Rashoudi, and the dates of attendance or registration of each.

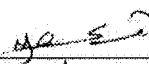
By agreement of counsel, defendants are responding to this interrogatory by stating that Fahad Alrashoudi began attending The Catholic University of America on July 9, 2012, in pursuit of a master degree in architecture, and all his courses were taught in English. Fahad Alrashoudi is still enrolled at The Catholic University but is on academic leave. Luluh Alrashoudi being attending The Catholic University of America on August 25, 2012, in pursuit

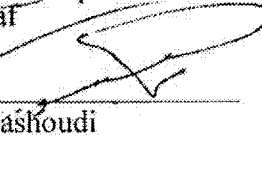
of a bachelor's degree in architecture, and all her courses were taught in English. Luluh Alrashoudi is still enrolled at The Catholic University but is presently taking a semester abroad. Sarah Alrashoudi attended The New School of Northern Virginia from the beginning of August 2012 until June 14, 2014, in pursuit of a high school diploma, and most of her courses were taught in English. Ibraheem Alrashoudi did not attend school in the United States.

14. Describe the room (or, if it changed over time, the rooms, and the dates each such room was occupied) in which Plaintiff was housed when she was staying with one or more of the Defendants in the house located at 10686 Waterfalls Lane, Vienna, VA 22182, including its size, location in the house, means of access, furnishings, flooring, lighting, windows, bathroom facilities, and method of providing heating and cooling, and identify every repair or improvement undertaken to provide heating or cooling, including the date and cost of each such repair or improvement.

From the end of July 2012 until mid-October 2012, Halah Alrawaf, Fahad Alrashoudi, Luluh Alrashoudi, and Sarah Alrashoudi stayed at the Archstone Apartments in Fairfax, Virginia and had two apartments. The first apartment was a three-bed two-bath apartment on the ground floor where Halah Alrawaf, Fahad Alrashoudi, Luluh Alrashoudi, and Sarah Alrashoudi lived. The second apartment was a one-bedroom one-bath apartment on the fourth floor which had a fireplace and where Ms. Muchira lived by herself. Sometimes, Ms. Muchira became frightened to stay by herself in that apartment and she would switch places with Fahad Alrashoudi. Later, she would return to her own apartment. In mid-October 2012, defendants moved to a rented home at 10686 Waterfalls Lane, Vienna, Virginia. In that house, Ms. Muchira had her own bedroom on the fully-finished and furnished basement level close to the walkout door. Her room had been used as a guest bedroom by the owners of the house. It had a window, full bath, a

I declare under penalty of perjury of the laws of the United States of America that I have made the foregoing responses to the extent they apply to me and those responses are true and correct. Executed today, October 20, 2014.

  
\_\_\_\_\_  
Halah Alrawaf

  
\_\_\_\_\_  
Ibraheem Alrashoudi

  
\_\_\_\_\_  
Fahad Alrashoudi

  
\_\_\_\_\_  
Lufuh Alrashoudi